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November 15, 1993

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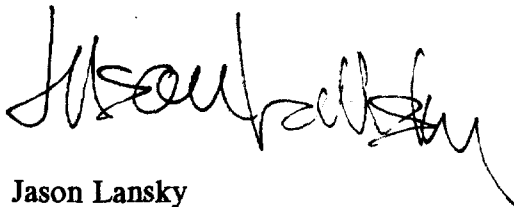
Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

Dear Sir:

Included, please find a total of ten copies of my comments on PR-Docket No. 93-267, released on November 4, 1993. One copy is for the Secretary and the remaining nine are provided so each Commissioner may receive a personal copy of my comments.

I appreciate your cooperation in this matter.

Sincerely,



Jason Lansky

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PR Docket No. 93-267

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November 15, 1993

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COMMENTS OF JASON LANSKY

The author believes that the Commission's proposal to provide temporary operating authority to new amateurs would be detrimental to the amateur radio service causing confusion, increasing the availability of abuse and that, with amateur radio being governed by a federal agency, assignment of all amateur radio station callsigns remain under the auspice of the Federal Communications Commission and not a "third party."

Argument Against Providing Temporary Operating Authority To New Amateurs

The Federal Communications Commission, in an attempt to expeditiously address the problem of amateur license processing delays, has taken upon itself an "easy way out" of a problem that extends beyond the amateur radio service and into the budget of the FCC itself. Upon completion of my reading PR-Docket No. 93-267, I feel the Commission has failed to investigate the deleterious effects of the temporary authority authorized under the proposed docket and the associated ease of abuse of the "WZ" callsign structure.

Amateur radio operators especially those involved in the Volunteer Examiner program, like myself, should be made aware of the Commission's research, if any, of the probability that PR-Docket No. 93-267 will actually reduce the number of inquiries by persons checking on their license applications. To my knowledge, the Commission has not researched the number of inquiries from individuals checking on the status of their applications who currently *hold* FCC issued callsigns, how this proposal deters individuals with *pending applications for upgrades* from continuing to contact the FCC and how a temporary callsign would, in any way, deter an individual with a pending application from contacting the FCC.

The West Carolina Amateur Radio Society/VEC, Inc. (Wescars) has stated that,

"...providing temporary operating authority would result in cost savings for the Commission because there would be a reduction in the number of inquiries by persons checking on the status of their license applications."

Inasmuch as the statement of Wescars may be somewhat valid, the Commission fails to address what impact the proposed callsign structure would present to the amateur service, the responsibility it places upon the various VECs and the opportunity the proposed callsign structure presents for abuse by non-licensed, non-authorized individuals and seems to be stressing the fact that the temporary operating authority as proposed under PR-Docket No. 93-267 would save the commission money.

Tracking "WZ" Callsigns And Maintaining A Database

Under PR-Docket No. 93-267, no provisions are included to cover documentation of callsigns issued, to whom they are issued and whether or not information regarding various "WZ" callsign holders would be available to the public. As such, there are no provisions for an individual amateur to confirm the validity of a "WZ" callsign. Being as amateur radio is "self policing," the "WZ" callsign structure makes it virtually impossible for an amateur to determine if a particular "WZ" callsign heard on the amateur bands is, in effect, valid. This leaves open the possibility of a licensed amateur communicating with an unlicensed station, a clear violation of Part 97 rules. The availability of CD ROM callsign databases and a regular publication of latest issued FCC callsigns in various related publications keeps the amateur radio community current on the most recently issued FCC amateur radio callsigns.

Possible Multiple Issue Of Like Callsigns

Under PR-Docket No. 93-267, no provisions are included which address the possibility of individuals at the same VE test site being issued the same callsign. Initials and addresses are not the same as fingerprints. The concern by the author is that, whether issued on the same test date or weeks apart, such a situation can pose many problems for both the holders of the "WZ" callsign and those who may communicate with them.

Ease Of Abuse Of Proposed Callsign Structure

Under PR-Docket No. 93-267, as no provisions exist for tracking the "WZ" callsigns, availability of such a callsign structure would create an even easier and intractable source of callsigns for use by individuals who do not qualify to operate an amateur radio station. An example would be a not-so-honest amateur who may mention to a friend or family member that, if they really need to, they could contact him or her on the local repeater frequency by "using *this* callsign" because "no one can track it" and it "may be issued many times anyway." Unlike "bootlegging" a real amateur radio callsign, the "WZ" callsigns, being drastically different from any other callsign structure heretofore introduced to the amateur service and the strong possibility of the same "WZ" callsign constantly being reissued, would make it very easy for unlicensed individuals to access the amateur radio frequencies without any regard, knowledge of or respect for Part 97.

Federally Regulated Entity

The Federal Communications Commission's power to govern amateur radio has been weakened severely over many years due to budget cutbacks and lack of manpower. Amateur radio is and always has been under the auspice of the Federal Communications Commission. The callsigns issued are from that federal agency. By allowing a "third party" (in this case, volunteer examiners)

to issue callsigns, temporary or otherwise, the regulatory authority of the FCC may be diminished in the eyes of many under temporary license authority and may even give certain VEs the feeling that they have power "above and beyond" the average amateur because they can, in effect, issue callsigns. It is the author's opinion that it would be in the best interest of the Commission, their image as a "federal regulatory agency" and the amateur radio community as a whole for the FCC to maintain total and complete regulatory control over issuance of FCC amateur radio operator and station licenses and callsigns.

Conclusion

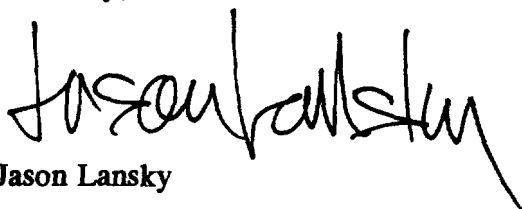
The callsign is the identity of the amateur radio operator. By reducing the callsign to an on-the-spot jumbled creation, the identity by which all amateurs have with their callsigns begins to crumble. It is quite disheartening when something an amateur radio operator works so hard to achieve, that is, an individual and unique identity with a callsign, is threatened to become summarily reduced to a random, temporary hodgepodge of letters and numerals. Therefore, it is the opinion of the author that the Commission should explore other means to address the manpower burden associated with processing amateur radio license applications. The "band-aid" approach proposed in PR-Docket No. 93-267 does not address the actual problem, which is the time delay between receipt of license paperwork and issuance of a license. An effort on behalf of the Commission should be made to streamline the paperwork process. With use of modern technology, i.e. fax machines and computer modems, the paperwork process can be significantly reduced if not totally eliminated, alleviating the burden of FCC staffers from paper shuffling and the need for temporary operating authority of new amateur radio operators.

Author's Qualifications

I obtained my amateur radio license at age 13 in 1980. Within 6 months of receiving my novice license I had successfully obtained my Extra Class license and was issued the callsign NF6E which I hold to this day. I am currently President of the Amateur Radio Club of El Cajon (ARCEC) which maintains a membership in excess of 500. I have taught amateur radio rules, theory and Morse code proficiency to individuals through classes sponsored by ARCEC and have been active in the Volunteer Examiner program under SANDARC (San Diego Amateur Radio Council) for 3 years. I currently manage one of 5 SANDARC VE test sites in San Diego. I own and maintain 2 mountain top repeater systems on 440 MHz. and 1.2 GHz and am currently Vice Chairman of the 1994 ARRL Southwestern Division Convention.

Thank you for your consideration of these comments.

Sincerely,



Jason Lansky